

*Federal Court*  
STATES AT NASHVILLE

DISTRICT OF TENNESSEE

IN THE UNITED STATES

PATRICK JAYSON REENERS

Plaintiff,

2023 APR 24 PM 3:42

U.S. DISTRICT COURT  
MIDDLE DISTRICT OF TN

IN THE UNITED

FOR THE MIDDLE

03-23 0401

v.

No. \_\_\_\_\_

JURY DEMAND

MICHELE LANDRY JOUVENCE

MARY GUNEUG,

PASCAL CLAUDE JOUVENCE,

JOHN AND JANE DOES 1 THROUGH 5,

JOHN DOE CORPORATIONS 1 THROUGH 5, and

OTHER JOHN DOE ENTITIES 1 THROUGH 5,

all whose true names are unknown, Defendants.

COMPLAINT

Comes now Patrick Jayson Reeners, PRO SE, and brings this cause of action would state as

follows.

## I. INTRODUCTION

This action arises and falls under the First, Fourth, Fifth and Fourteenth Amendments to the United States Constitution; under federal law, specifically, 42 U.S.C. §§1983 and 1988; under the Tennessee governmental tort liability statutes; under Tenn. Code Ann. §29-20-101, et seq, and under Tennessee common law for intentional and, or negligent, infliction of emotional distress, negligence, gross negligence, assault, and civil conspiracy, free speech retaliation, harassment, stalking, aggravated assault.

## II.JURISDICTION AND VENUE

1. This Honorable Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§1331, 1332, 1343, and 1367, and venue is properly set in the United States District Court for the Middle District of Tennessee pursuant to 28 U.S.C. §1391.
2. The causes of action herein arise from several allegations involving and occurring in Gallatin Tennessee which is in this Jurisdiction.
3. The defendants, presently located at the time mentioned in this complaint in this Honorable Courts and the defendants companies were present, and the companies were at the time of actions are were District Jurisdiction. and Venue is proper for all claims before this Honorable Court.
4. Venue is proper in this court to hear all the colorable claims, and counterclaims put forth directly and, or indirectly involved actions that need a Federal Judge to rule on the Federal Causes of action.
5. On information, facts, and belief, each of the named Defendants resides in this

judicial district, the defendant's were here all residing within the division, and jurisdiction of this Honorable Court.

6. Plaintiff resides inside the state of Tennessee on 317 Malone dr in Gallatin Tennessee with in the Courts Jurisdiction.

7. The amount in controversy is in excess of \$999,999.99

### III. PARTIES

#### A. Plaintiff

8. The Plaintiff, PATRICK JAYSON REENERS, self styled activist who is a Born United States Citizen, and resident of Gallatin, Tennessee.

#### B. Defendants

9. The Defendant, MICHELLE LAUNDY JOUVENCE, is the owner of Lucy B Inc and a US citizen and resident of, Tennessee, and was at all times material to the allegations in this Complaint, acting with the authority given to Police Officer duties not Vigilante's in Tennessee, and was acting with the authority as if she was under color of state law.

10. The Defendant, MARY GUNEUG, is a citizen and resident of, Sumner County Tennessee, and was at all times material to the allegations in this Complaint, acting in his capacity as a County Commissioner, an elected official for Sumner County, Tennessee, and was acting with authority given to officers, judges, magistrates, under color of state law

11. The Defendant, PASCAL CLAUDE JOUVENCE, is a Naturalized Us citizen, and resident of Sumner County, Tennessee, and was at all times material to the allegations in this Complaint, the Director and Owner of PCJ Consulting Inc in Sumner County, Tennessee and was acting with the authority of a Police Officer under color of state law.

12. Upon information and belief, Defendants John and Jane Does 1 through 10 (the "Individual Defendants") are individuals whose names and addresses of residences are unknown.

13. Upon information and belief, Defendants John Doe Corporations 1 through 10

(the "Corporate Defendants") are corporations, the names and addresses of residences of which are unknown.

14. Upon information and belief, Defendants Other John Doe Entities 1 through 10 (the "Other Entity Defendants") are other legal entities, the names and addresses of residences of which are unknown. The Individual Defendants, Corporate Defendants, and Other Entity Defendants are collectively referred to as the Defendants.

#### IV. FACTS

15. Plaintiff asserts and incorporates all allegations in lines 1 through 14, and incorporates here in.

16. The Plaintiff in about mid october after candidates, and citizens, advocating or demonstrating against the running candidates for city positions.

17. Plaintiff allowed to put signs.

18. The signs read PASCAL with a circle around it and a line through it.

19. Days later the Plaintiff witnessed Michelle, and Pascal came into City Hall together, and Michelle asked me, and two other witnesses whose signs they were.

20. The plaintiff told Michelle in front of Pascal, and the two witnesses they were his signs.

21. Both of those defendants returned to put plaintiffs' signs in thier truck with no intention to return them and never have.

22. The Political protest signs that are regulated by City Law Enforcement

23. Michelle, and Pascals took the signs to keep to cull, and stop the plaintiff

24. The defendants Pascal ,and Michelle assumed authority of law enforcement as so it appeared to the plaintiff seeing no enforcement regarding thier actions were really were in fact enforcing laws.

25. Pascal was at all time in this complaint a registered candidate for the Gallatin City Council.

26. Pascal was at all times in this complaint under a Federal Oath of Allegiance to the United

States Constitution.

27. Michelle Jouvence is the spouse of Pascal and together conspired to and did deprive the plaintiff from protected speech not as citizens but under the authority of the law enforcement that enforce laws not rules.

28 When Pascal, and Michelle returned up stairs I went down to the parking lot and my signs were not there, and I was saddened, and decided to leave instead of staying at the meeting and talk again culling the plaintiffs free speech.

29. I checked the city pickup truck that the city officials put signs that violate the rules so people get thier signs there was no sign of my signs.

30. The defendant Michelle did call the police about me having a sign tied to a branch of a tree enforcement came to cull or stop the plaintiffs right to free speech.

31. I checked the city pickup truck that the city officials put signs that violate the rules so people can get thier signs back, plaintiffs saw no sign of his signs.

32. I had about \$75.00 dollars in materials in which I did use to make those that were stolen and more signs.

33. The Tennessee Laws protect citizens from having thier property stolen the plaintiff Michelle being in possession of my signs and Pascal with her makes Pasca just as responsible for the theft as Michelle.

34. The persons acting as law enforcement at this time were Pascal and Michelle by action without holding any badge or uniform we must assume one's actions to portray the character in which they played.

35. The plaintiff assumed Pascal, and his wife Michelle Landry Jouvence acted like they were under color of law when enforcing the laws on political signs which deprived the plaintiff to his right to Due Process of Law under the 14th Amendment of the constitution of the United States of America.

36. To this day the plaintiff has no knowledge of any criminal charges that have been filed against any of the defendants for all of these crimes alleged in this complaint.

37. The defendants Pascal and Michelle Jouvence both in thier actions perpetrated actions as real certified law enforcement, under color of state law and the 14th Amendment!

38. The Gallatin City Charter, Tennessee Law, and Federal Law dictates who is to up hold and enforce these laws .

39. On or about October 1 st 2002 the Plaintiff prrepared 2 big yellow and red signs to be display at the Fall Square Fest .

40. Pliantiff spent about \$25.USD, and about 6 hours wworking on the signs.

41. One sign had Pascal The Deceiver on it!

42. The other sign had Pascal "=" Liar.

4. Upon arriving at the festival i placed the deceiver sign on the brick building behind the makeshift jail for kids to see.

44.I crossed the street asked the 2 vendors out of respect if I could put up my signs In between them both vendors told me they didn't have a problem.

45. I then looked up across the street and my sign with deceiver on it was gone.

46. I went across the street to check it out I looked around and saw a lady with her hands on my other sign

47. I then ran across the street, and ripped my sign out of her grip while calling her a thief thief thief. Plaintiff is not pursuing this free speech hater for touching and trying to steal his signin this action.

48The lady depicted in a you tube short thumbnail posted by the defendant is a subject Doe Defendant.

49.Michelle then decided to lobby the 2 vendors i was between about my appearance and placement with my sign trying to cull and prevent my free speech.

50. After being threatened of going to get the police called on me I moved to the middle of the road across from pascal till I went home for about an hour.

51The road was closed, and opened for the public to be in.

52.. On or about October 19th at about 4: PM CST the plaintiff was at the adress next to the Church adress where the early elections were being held.

53..The plaintiff was there to express his free speech against the defendant Pascal and his lies, and False reports against the City Officials with no evidence putting the City in a false negative light.

54. The plaintiff was confronted by some people that were there and talked to them in good spirits.

55.The defendant Pascal was there with Michelle, and shortly after I was there the defendant's wife and co defendant walked up to me with a camera.

56. While sitting on my mower at a different address where I had permission to be, I watched

57. Michelle walk up leaving the address of the Election ony to harrass me by filming herself blocking my sign while working on Pascal's campaign knowing I was breaking no law and have a right to free speech.

58. Michele got really to close and I was concerned about if she had a black eye because she was the only one there at the Election gathering that had a set of eyeglasses on.

59. Michelle proceeded to block my sign for a while and then walked back to the address where the Election was going on.

60..Just after that happened Pascal was stalking me and pulled up close to block my sign at the address different from the the election, and did not have permission to be there and was told to leave several times by the plaintiff.me on the grass at a separate address several times with his Ford SUV and I was Scared for my life.

61, After the plaintiff called the police to report the incident they came to my house and I gave them a verbal statement that was recorded on thier body cam.

Violation of Civil Rights Pursuant to Title 42 U.S.C. §1983

(General Allegations)

70. Plaintiff reallege and incorporate herein by reference the allegations set forth in paragraphs 1-58 of this Complaint.

71. In committing the acts complained of herein, Defendants acted under color of state law to deprive Plaintiff of certain Constitutionally protected rights under the First, Forth, and The Fourteenth Amendments to the Constitution of the United States including, but not limited to: a) the right to Free Protected Political Speech against the GOVERNMENT, GOVERNMENT ACTORS(ELECTED OFFICIALS ); b) the right not to be deprived of liberty without due process of law c) the right not to be deprived of property without due process of law; d) the right to be free from excessive use of force by persons acting under color of state law; f) the right to just compensation for taking of property. The defendant Demands a Jury Trial for Punitive Damage! The right to have a Court decide a Crime or City Ordinance is protected under the the Constitution of The United States Defendants, in violation of Plaintiffs' rights under the First, Fourth, and Fourteenth Amendments to the Constitution of the United States.

72. As a direct and proximate result of the violation of their constitutional rights by the Defendants, Plaintiffs suffered general and special damages as alleged in this Complaint and are entitled to relief under 42 U.S.C §1983 42 U.S.C §1985 .

73. The conduct of Defendants was willful, malicious, oppressive and,or reckless, and was of such a nature that punitive damages should be imposed by a Jury.

COUNT II

(Depriving the Plaintiff of his Due Process Right

ALL DEFENDANTS

Violation of Civil Rights Pursuant to Title 42 U.S.C. §1983

74. Plaintiffs reallege and incorporate herein by reference the allegations set forth in paragraphs 1-61 of this Complaint.

75. Defendants Pascal, Michelle and Mary violated my right to due process of law intervening in free speech and all defendants interrupted,, removed and or blocked, made flase claims to facebook to have posts deleted from a Government Page.

76. Defendant Mary removed my posts on facebook and blocked me which cull and blocked my free speech which deprived the plaintiff of his right to due process of law.

77. Defendant Pascal attacked me with his SUV while driving on the grass and sidewalk to stop my free speech and deprived me of that Constitutional protected activity while acting with the Authority of law enforcement.

78. The defendant actions mount up to deliberate indifference to the rights of the Plaintiff to be free from excessive force and, Freedom of Speech unreasonable seizures under the First Fourth, Fifth, and Fourteenth Amendments to the Constitution of the United States.

79. The defendants failure to allow the local law enforcement to handle legal issues and posts made on social media pages that are government affiliated where as any one can visit and any one can post making it a traditional public forum and a public record.

The defendant deprived the plaintiff with several violation of law , and all defendant were acting under the authority of color of state law, and unreasonable seizures under the First Fourth, Fifth, and Fourteenth Amendments to the Constitution of the United States.

80. As a result of this deliberate indifference to the Reeners's rights, the plaintiff suffered personal injuries, to Reeners, and is entitled to relief under 42 U.S.C. §1983.

81. In committing the acts complained of herein, Defendants acted under color of state law to deprive Plaintiffs as alleged herein of certain constitutionally protected rights including, but not limited to: a) the right to be free from unreasonable searches and seizures; b) the right

not to be deprived of liberty without due process of law; c) the right not to be deprived of property without due process of law; d) the right to be free from excessive use of force by persons acting under color of state law; the plaintiff the right to just compensation for taking of property, and Punitive Damages

COUNT III

(Use of Excessive Force)

DEFENDANT PASCAL JOUCENCE

Violation of Civil Rights Pursuant to Title 42 U.S.C. §1983

82. Plaintiffs reallege and incorporate herein by reference the allegations set forth in paragraphs 1-81 of this Complaint.

83. The Defendant, , Pascal Tennessee, has adopted policies, procedures, practices or customs within the Gallatin Police Department that allow, among other things, the use of excessive force when other more reasonable and less drastic methods are available.

84. The actions of Defendant Pascal amounts to deliberate indifference to the rights of the plaintiff to be free of excessive force and unreasonable seizures under the Fourth, and Fourteenth Amendments to the Constitution of the United States.

COUNT IV

(Conspiracy to interfere with civil rights)

ALL DEFENDANTS

Violation of Civil Rights Pursuant to 42 U.S.C.

85. Plaintiffs reallege and incorporate herein by reference the allegations set forth in paragraphs 1-84 of this Complaint.

86. In committing the acts complained of herein, Pascal, Michelle, Mary acted under color of

state law by falsely acting as law enforcement, Magistrates, and Judges when they culled and stopped Plaintiff Free Speech with no basis in fact or law to do so. In violating Plaintiffs' right to to be free from false arrest, the Defendants violated Plaintiffs' rights under the First, Fourth, and Fourteenth Amendments to the Constitution of the United States.

87. As a direct and proximate result of the violation of their constitutional right to be free from citizens to conspire against Plaintiffs Civil Rights and suffered serious duress, and special damages as alleged in this Complaint and are entitled to relief under 42 U.S.C. §1983.

COUNT XI

DEFENDANT PASCAL

Tennessee Common Law

(Assault)

88. Plaintiffs reallege and incorporate herein by reference the allegations set forth in paragraphs 1-87 of this Complaint.

89. Plaintiff avers that the actions of the Defendants breached a duty of care owed to Plaintiff to not assault them or cause them physical harm or injury, except to the extent allowed by law.

90. Plaintiff avers that the Defendants knowingly, wantonly, intentionally, and with gross disregard for the rights of Plaintiff, the defendant Pascal assaulted him by using his SUV to Attack the plaintiff and make him fear for his life

91. Further, Mr Reeners, more specifically , Pascal repeated attacks against the plaintiff were a breach of the Peace Dignity to The State of Tennessee, The United States Government while in this Honorable Courts Jurisdiction.

92. Further, Plaintiff Patrick Reeners was in fear from Pascals preventing me from peacefully protesting his lies against my City.

93. As a direct and proximate result of the acts of the Defendant, Plaintiff suffered both

62. The plaintiff has the video of this occurrence as does the defendant Michelle she filmed the situation.

63. The video was given to the plaintiff, and he uploaded it to you tube, and named it "WIZARDS TURN" <https://www.youtube.com/watch?v=vuQGfqnvUXQ>.

64. The plaintiff is not aware of all the evidence there at this time and reserves the right to amend his complaint upon receiving evidence with cause of action that is a colorable claimable to be heard by this Honorable Court.

65. The defendant Mary Geuneg Sumner county Commission refused to comment back to the plaintiff on her advertised Government platform for a sitting Elected Official that started this Public Forum.

66. The Defendant Mary allowed participants from anywhere in the world people from any country could come, and visit her FaceBook(Meta) page.

67. Mary the defendant Blocked the plaintiffs Political speech and in doing so Retaliated against free speech.

68. Free Speech retaliation is a violation of the Constitution, and Contemp of the Oath is a violation of the Constitution.

69. Mary acted as a Judicial Official and was acting under the authority under color of law when she blocked political speech, and or deleted the plaintiff's political free speech.

#### V. CAUSES OF ACTION

##### COUNT I

(Free Speech Retaliation)

ALL NAMED DEFENDANTS

physical, and mental injuries and are entitled to relief.

**PRAYERS FOR RELIEF**

WHEREFORE, the above premises considered, Plaintiff demand:

1. That process issue to the Defendants and that they be required to answer in the time allowed by law.
2. That judgment be rendered in favor of the Plaintiff and against the Defendants on all causes of action asserted herein.
3. That Plaintiff be awarded those damages to which it may appear they are entitled by the proof submitted in this cause for their physical and mental pain and suffering, both past and future; permanent injury and disability; loss of enjoyment of life; loss of their personality; medical, and psychological expenses, both past and future.
4. That Plaintiff be awarded punitive damages against the Defendants.
5. That Plaintiff be awarded reasonable expenses incurred in this litigation, including reasonable attorney and expert fees, pursuant to 42 U.S.C. §1988 (b) and (c).
6. That the Plaintiff receive any other further and general relief to which it may appear they are entitled.
7. A jury for the trial of this matter.

Respectfully Submitted,

Patrick Jayson Reeners

317 Malone DR

Gallatin TN, 37066

202-695-2095

PRO SE Plaintiff